

From: sschlitt@jwnorthamerica.com
To: [Struckmeyer, Richard](#)
Subject: [External_Sender] Response to RAI - Control No. 617996 - Renewal of NRC License: 20-23981-01E
Date: Tuesday, March 24, 2020 4:14:11 PM
Attachments: [2nd JWNA Response to RAI - Control No. 617996.pdf](#)

Hello Mr. Struckmeyer,

Please find attached an amendment / addendum to our original response to your RAI.

We are hopeful that our renewal application is now sufficiently in compliance with regulations to be granted a renewal.

However, if you need additional information or clarification, of course, please contact me via email or mobile phone.

Thank you,
Steven

*Steven Charles Schlitt
Director of Engineering and Quality Assurance
JW North America, Inc.
Office: 781-331-0949 X107
Cell: 781-534-0574*

From: Struckmeyer, Richard <Richard.Struckmeyer@nrc.gov>
Sent: Tuesday, March 24, 2020 12:22 PM
To: sschlitt@jwnorthamerica.com
Subject: RE: RE: JWNA Response to RAI Control No. 617996 - Renewal of NRC License: 20-23981-01E

Mr. Schlitt,

You have interpreted my email correctly. You can use either the name or the license number or both, although there is no need for both. So the answer to your last question is "yes."

Richard K. Struckmeyer
Materials Safety Licensing and Tribal Liaison Branch
Division of Materials Safety, Security, State, and Tribal Programs
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
301-415-5477

From: sschlitt@jwnorthamerica.com <sschlitt@jwnorthamerica.com>

Sent: Tuesday, March 24, 2020 12:16 PM

To: Struckmeyer, Richard <Richard.Struckmeyer@nrc.gov>

Subject: [External_Sender] RE: JWNA Response to RAI Control No. 617996 - Renewal of NRC License: 20-23981-01E

Hello Richard,

Thank you for your quick response.

So, if I understand you correctly, we can change the container labels that I submitted in my letter to indicate **JW North America, Inc.**, (the Initial Transferor/ Licensee) instead of the German supplier “**BLV...** “ and that will satisfy the requirements. This assumes that NRC recognizes that we have insufficient space on our products to label with our company name.

Am I interpreting your email correctly ? Should I re-submit labels with our company name in place of the “manufacturer” ?

One other question: I think I read that it would be admissible to make a statement such as “ Distributed under USNRC License No. 20-23981-01E”. Would that be a viable option rather than labeling the Transferor ?

Thanks,
Steven

*Steven Charles Schlitt
Director of Engineering and Quality Assurance
JW North America, Inc.
Office: 781-331-0949 X107
Cell: 781-534-0574*

From: Struckmeyer, Richard <Richard.Struckmeyer@nrc.gov>

Sent: Tuesday, March 24, 2020 11:12 AM

To: Steven Schlitt <sschlitt@jwnorthamerica.com>

Subject: RE: JWNA Response to RAI Control No. 617996 - Renewal of NRC License: 20-23981-01E

Mr. Schlitt,

The regulations require that the licensee "Label or mark each unit ... and its container so that the manufacturer or initial transferor of the product and the byproduct material in the product can be identified." I recognize that this is not made especially clear, but the manufacturer or initial transferor here refers to the licensee. Therefore, the initial transferor should be identified on each product. The reason is that the regulatory requirements apply to licensees who may be manufacturers or initial transferors, or both. You may put the manufacturer on the shipping containers if desired, so it would not be necessary to change the existing labels.

As you noted, if an electron tube is too small to label, then the label should be placed on the next smallest container or its immediate container, such as the bubble pack containing the electron tube. You should add a label to the product container(s) that identifies the initial transferor.

This is my initial observation upon receipt of your response. I will let you know if I have any further questions.

Regards,

Richard K. Struckmeyer
Materials Safety Licensing and Tribal Liaison Branch
Division of Materials Safety, Security, State, and Tribal Programs
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
301-415-5477

From: Steven Schlitt <sschlitt@jwnorthamerica.com>

Sent: Monday, March 23, 2020 2:39 PM

To: Struckmeyer, Richard <Richard.Struckmeyer@nrc.gov>

Subject: [External_Sender] JWNA Response to RAI Control No. 617996 - Renewal of NRC License: 20-23981-01E

Hello Mr. Struckmeyer,

I hope you are doing well in these extremely troubling times !

Attached is our response to you recent RAI letter in which you noted insufficiencies in our proposed labeling. The upshot of it is that due to the size limitations of our products, we are requesting that we be permitted to relocate the Manufacturer's/Transferor's name and the identification of the byproduct materials from the lamps to the immediate package in which each lamp (electron tube) is contained. This is partially fulfilled, already.

As mentioned in the closing notes in my response letter, our physical office will officially close tomorrow until, at least, April 7. Hopefully, our state government will

allow us, and all the other (non-essential) businesses to re-open on that date. In the meantime, like you, I will be working out of a home-office.

You can correspond with me via email and my mobile phone, as necessary.

Best regards,
Steven

Steven Charles Schlitt
JW North America, Inc.
Director of Engineering and Quality Assurance
781-331-0949 (Office)
781-534-0574 (Cell)

From: Struckmeyer, Richard [<mailto:Richard.Struckmeyer@nrc.gov>]
Sent: Wednesday, March 18, 2020 5:20 PM
To: sschlitt@jwnorthamerica.com
Subject: Copy of letter requesting additional information for renewal of NRC exempt-distribution license

Mr. Schlitt,

Due to the COVID-19 situation, most NRC HQ employees are teleworking, making it somewhat less efficient to get letters into the mail, so I am attaching a copy of our Request for Additional Information in response to your application for license renewal.

You should receive a paper copy within a week or so, but you do not need to wait for it to provide a response to my letter. To keep the process moving, you may want to send your response by email. If so, please attach a signed letter as a scanned copy. If that is not currently possible, please follow up at your earliest convenience with a signed copy.

Regards,

Richard K. Struckmeyer
Materials Safety Licensing and Tribal Liaison Branch
Division of Materials Safety, Security, State, and Tribal Programs
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
301-415-5477



March 24, 2020

MATERIALS SAFETY LICENSING BRANCH
DIVISION OF MATERIAL SAFETY, STATE, TRIBAL AND RULEMAKING PROGRAMS
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

Reference: Control Number 617996 – Response to RAI

**Subject: REVISION TO S. SCHLITT LETTER OF MARCH 23, 2020
RENEWAL OF MATERIALS LICENSE 20-23981-01E**

Dear Mr. Struckmeyer,

In my letter dated March 23, 2020, I responded to your Request for Additional Information by indicating that due to the size of our electron tubes, direct marking of the units themselves, required by 10 CFR 32.14(b)(6) and 10 CFR 32.15(d)(1) was not feasible. Alternatively, we propose to label the immediate lamp containers uniquely associated with the products. (Note: Our packages do not include bubble wrap or other internal packing materials other than the cardboard container itself).

In the examples of the proposed labeling of the immediate containers that I presented in my letter, I showed labeled containers with the name and address of the actual manufacturer located in Germany. After a brief review of our proposed labeling presented in our letter, you informed me today that it is the intent of the regulation to require that the name of the Initial Transferor or Licensee, appear on the units and on the containers, and not the actual manufacturer, if the Manufacturer is not the Licensee. In our case the manufacturer is NOT the Licensee. You had also indicated to me that a reference to the Materials License Number could be substituted for the legal name of the Licensee.

In consideration of the information that you provided in your email to me today, we are amending our original proposed labeling. On the following pages, you will see graphical images representative of a variety of different lamp containers that we use and how we propose to label them in accordance with regulations. We intend to label all other containers in our product line in a like manner.

Please review our new proposed labeling and let me know if you have any additional questions or need any additional information.

Thank you for your guidance in this matter.

Best regards,
Steven Schlitt

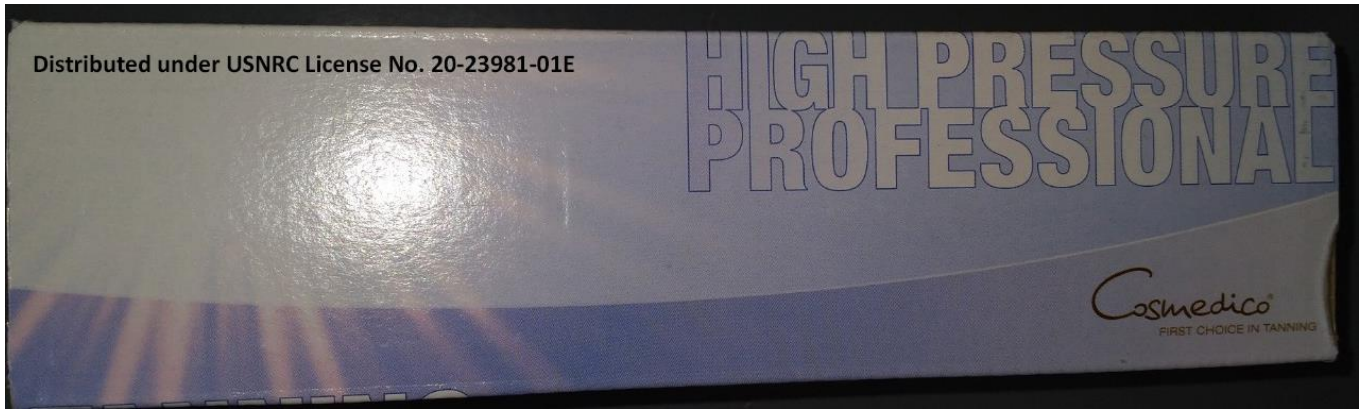
A handwritten signature in blue ink, appearing to read 'Steven Schlitt'.

Steven Charles Schlitt - Director of Engineering / Quality Assurance

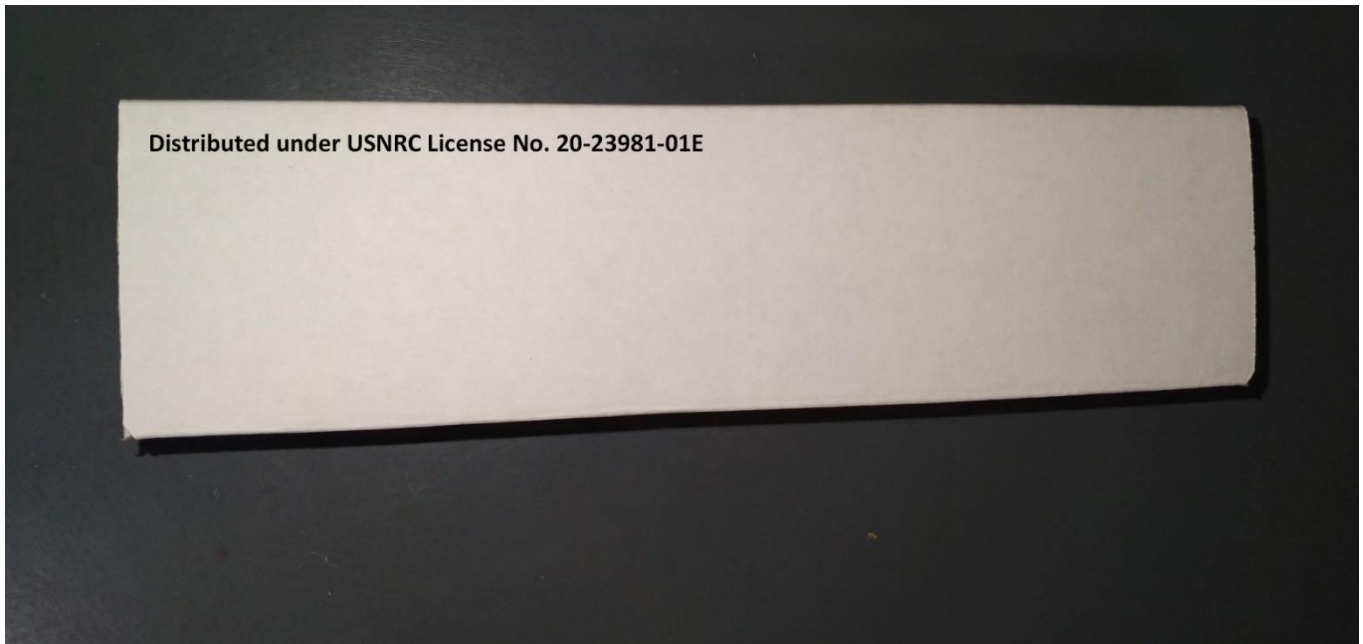
PROPOSED LABELING OF ELECTRON TUBES

JW NORTH AMERICA, INC. (LICENSE NO. 20-23981-01E)

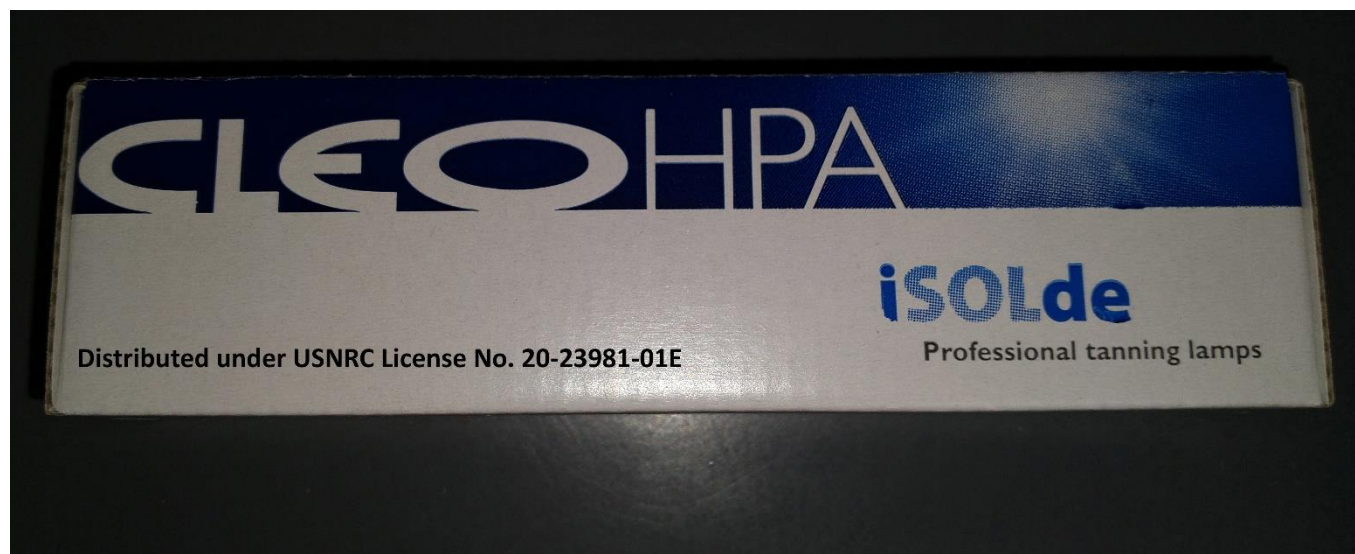
EXAMPLE 1: Cosmedico Branded Lamps and Packages



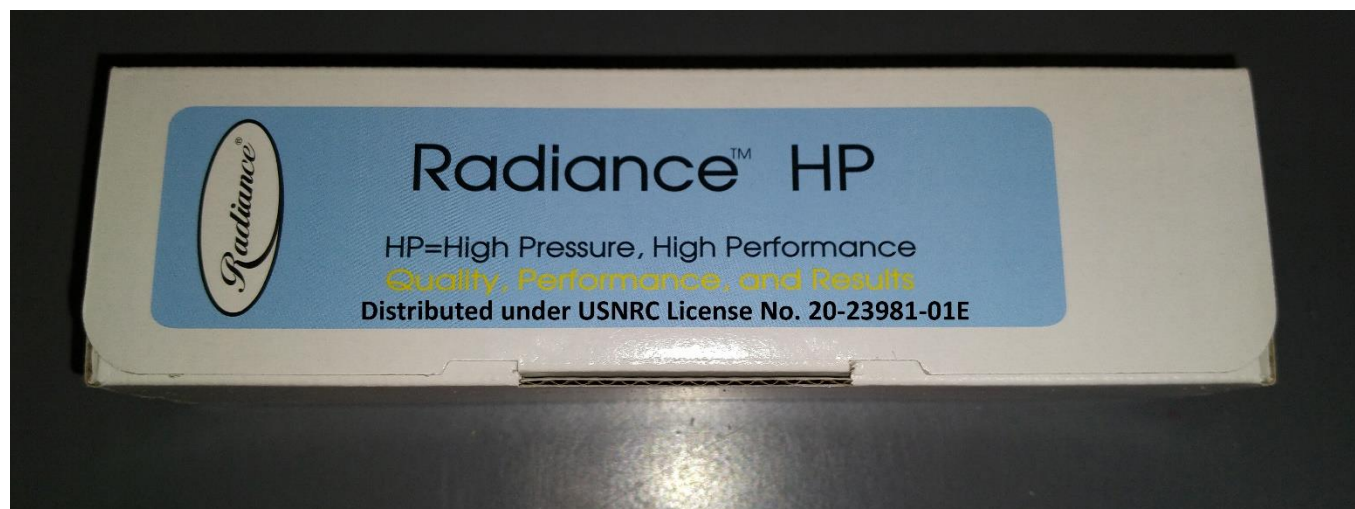
EXAMPLE 2: Generic (Plain) Box



EXAMPLE 3: ISOLde Branded Box



EXAMPLE 4: Radiance Branded Lamp Box



EAMPLE 5: SUPRA Branded Lamp Box

